

Office of Mental Health and Substance Abuse Services
Bureau of Policy, Planning and Program Development

Policy Clarification

Issue Clarification # 01-14-01
Date of Receipt: 01-15-2014

Applicability: Partial Hospitalization Programs
Source Documentation: Chapter 55, §1153; PC 01-13

Submitted by: OMHSAS Policy
County Authority: All
Topic Area: Defining and Delivering Group Services in Partial Hospitalization Programs (PHPs)

Question/Issue:

Must PHPs adhere to the definition of “group psychotherapy” in Medical Assistance (MA) regulations 55 Pa. Code §1153 (Outpatient Psychiatric Services), by size and duration for all groups convened that have two (2) or more participants?

Background/Context Provided within the Request :

In audits that occurred it was observed in a couple of partial hospitalization programs that group therapy was identified in the charts when what was provided did not completely adhere to the definition of group therapy as provided in PA Code Chapter 55, §1153.2. In March 2013, OMHSAS issued Policy Clarification PC 01-13 “Group Psychotherapy in Partial Hospitalization”, establishing that the definition of group psychotherapy as provided in PA Code Chapter 55, §1153.2 applies to the delivery of this treatment in Partial Hospitalization Programs. Since then, OMHSAS has received waiver requests asking for waiver of the definition of group therapy. Additionally, another policy clarification request was received inquiring about the restrictions applicable to the provision of psycho-education in partial programs.

OMHSAS

Answer/Response:

If the service that is determined to be medically necessary and identified in the recipient’s individualized treatment plan is **group psychotherapy**, then in order to be compensable, the group psychotherapy service provided must meet all of the requirements in MA regulations 55 Pa. Code §1153 @ <http://www.pacode.com/secure/data/055/chapter1153/chap1153toc.html>, and be documented as such. 55 Pa. Code §1153.2 defines **group psychotherapy** as *psychotherapy* provided to no less than two and no more than ten persons with diagnosed mental disorders for a period of at least 1 hour where sessions are conducted by a clinical staff person.

If the service that is determined to be medically necessary is a compensable PHP service, such as health education, but **is not psychotherapy**, and it is determined that a client would benefit from a group modality, the group does not need to be limited to 2-10 persons since the service being provided is not group psychotherapy. The service and group modality must be specifically identified in a client's individualized treatment plan, and the service provided in a group format must be documented as such, and not documented as "group psychotherapy".

55 Pa. Code § 1153.52 (b) (2) identifies components and services that must be available in a PHP. These services are compensable if determined to be medically necessary by a psychiatrist, specifically identified in a client's individualized treatment plan, and provided, documented, and billed within the regulatory requirements. Compensable PHP services include:

- (i) Individual, group and family psychotherapy;
- (ii) Health education that includes basic physical and mental health information, nutrition information and assistance in purchasing and preparing food, personal hygiene instruction, basic health care information, child care information, family planning information and referral, information on prescribed medications;
- (iii) Instruction in basic care of the home or residence for daily living;
- (iv) Instruction in basic personal financial management for daily living;
- (v) Medication administration and evaluation provided only by a psychiatrist, physician, registered nurse or licensed practical nurse;
- (vi) Guided social interaction supervised by psychiatric partial hospitalization personnel;
- (vii) Crisis management provided by psychiatric partial hospitalization personnel;
- (viii) Referral.

The above services are provided by a psychiatrist or by psychiatric PHP personnel under the supervision of a psychiatrist in a supervised, protective setting. If fee-for-service, PHP services are provided for a minimum of 3 hours and a maximum of 6 hours in a 24-hour period. The extent that these timeframes have been waived in HealthChoices to allow BHMCOs greater flexibility in determining the appropriate amount of service, may be found in Appendix BB of the HealthChoices Behavioral Health Program Standards and Requirements. Please note that since PHP services are reimbursed per hour of service, the individual must receive one (1) full hour of one or more of the PHP compensable services before the PHP can bill for that hour.

Ellen S DiDomenico

Director, Bureau of Policy, Planning, & Program
Development

2/27/2014

Date Issued